

The following comments were made orally at the public hearing on July 23, 2014 by Ms. Terri Pereira, Associate Planner for Churchill County:

1. I didn't actually see the application in the information that I was provided when I got the draft permit but many of my questions were answered in your presentation. So, I assume that there will be a Bureau of Air Pollution Control Permit.

*That is correct; that is a separate bureau within the Nevada Division of Environmental Protection (Division).*

2. Are there any other State or Federal agencies that are involved?

*Nevada's Solid Waste regulations require that the Applicant provide "Proof of compliance with any applicable ordinances or other requirements of the State or local governments for permits" [NAC 444A.290(7)] and "Proof of compliance with any applicable ordinances or other requirements of the local fire authority" [NAC 444A.290(8)].*

*With regard to GreeNu specifically, the facility received approval to construct a waste tire management facility on this site via a Special Use Permit (SUP) from the City of Fernley in November of 2012, a copy of which was provided in the application. The Applicant has also obtained a permit from the Division Bureau of Air Pollution Control, and has received approval of the fire prevention and suppression plan from the State Fire Marshall. For any other aspects of the waste tire management facility which fall under the jurisdiction of Federal, State, or local agencies, the Operator will be required to obtain all necessary permits and abide by all applicable regulations and statutes.*

3. Acquisition of those permits is not a condition of your permit?

*State Solid Waste regulations allow the issuing of the waste tire management Permit prior to obtaining all other Federal, State, and Local permits, but all such permits must be in place prior to initiating operations of the facility.*

4. Will there be a public hearing for the air quality permit?

*Some air quality permits do not require public notice. For the GreeNu facility specifically, an inquiry could be made to the Division Bureau of Air Pollution Control.*

5. With regard to the tires themselves, where did the 960,000 PTE (passenger tire equivalent) figure come from? Is that based on the size of the parcel, or the availability of tires?

*The facility is designed for a maximum storage capacity of 960,000 PTE. This represents the sum of the 100-foot by 50-foot by 10-foot high storage blocks completely filled with tire bales, based on the approximation of 100 PTE per bale.*

6. So there isn't any limit?

*The Permit does limit storage of PTEs to 960,000 at the facility. In addition, the Operator will be required to process three-quarters of the PTEs received every year so that it's not a continual accumulation of tires.*

7. Is the storage area covered or open, is it lined or just on the dirt?

*The storage area where waste tire bales are stacked will be open and paved with asphalt. The entire area will be graded to shed stormwater to the east toward the retention ponds so that no water is accumulated in the area where bales are stored.*

8. How are the four (product) streams stored and how is the product moved? Is it by truck or by train? How often?

*The facility design included with the application calls for pyro gas, after separate solids removal and sulfur reduction, to be stored temporarily in a tank and then 100% will be reused in the process to heat the pyrolysis chamber. Pyro oil will be stored in underground tanks until shipped off by rail in tank cars. Scrap steel will be accumulated in bins and then transported off-site by truck. Finally, the carbon black will be stored in a silo until shipped off by rail in hopper cars. In each case of shipment off-site, the frequency of releasing a shipment will be dependent on the rate of accumulation and may vary.*

9. None of this is hazardous waste?

*All of the identified material exiting the pyrolysis process is non-hazardous as defined in the Solid Waste regulations [NAC 444.580].*

10. How much water is required for this process? Will they need a production well?

*No water will be used directly in the pyrolysis process. Incidental quantities will be used for cleaning of equipment and for two closed-circuit cooling systems: one for the carbon black and scrap steel after exiting the pyrolysis chamber, and one for cooling the gas stream. As a result of the low quantities required, no production well is proposed in the application.*

11. What will be tested for in the groundwater wells, and how frequently will samples be taken?

*Samples will be taken from the upgradient and downgradient monitoring wells (2 total) and analyzed for the constituents listed in Appendix I of 40 CFR Part 258 [see NAC 444.5703 and NAC 444.7487]. The constituents listed include metals as well as volatile organic compounds. Sampling will be carried out and analytical results reported to the Division semi-annually.*

12. Once this is in operation will they operate 24 hours a day?

*The application calls for the plant to operate 24 hours per day, 330 days per year, allowing for periods of down time for routine maintenance and cleaning.*

13. Is there a similar plant somewhere in the United States that could be visited?

*Presently there are no representative facilities in the United States, but some have been operated in eastern Europe and the far east.*

14. Will the Fire Marshal require some kind of emergency plan, an evacuation plan, that will be provided to residents in the area?

*The emergency plan required by the Solid Waste regulations is concerned solely with putting out a fire at the site.*

15. What is the 250 gallon propane tank for?

*Before start of operations, there will be no supply of pyro gas to heat the pyrolysis chamber. The propane will be used at the start until sufficient pyro gas has been generated.*

No written comments were received during the public notice period.